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Attorneys for Plaintiff  
ANDREA NAKAGAWA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANDREA NAKAGAWA,

Plaintiff,

vs.

THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA, et al.,

Defendants.

Case No. C06-02066 SI

**STIPULATION FOR  
ENLARGEMENT OF TIME FOR  
COMPLETION OF DISCOVERY**

**TO THE HONORABLE COURT:**

The parties to the above-captioned action, pursuant to Local Rule 6-2(a) hereby request the Court to extend the date for discovery cut-off, currently set for June 13, 2008 as established in the Court's Pre-trial Preparation Order filed on October 9, 2007, pursuant to the parties' stipulation as described below.

**STIPULATION AND DECLARATION IN SUPPORT THEREOF  
TO ENLARGE THE TIME FOR COMPLETION OF DISCOVERY**

The parties to the above-captioned action, by and through their undersigned counsel of record, hereby stipulate and agree to extend the date for discovery cutoff currently set for June 13,

Case No. C06-02066 SI  
Nakagawa v. UC Regents  
Stipulation to Extend Discovery Cutoff

1 2008 by 30 days to July 13, 2008.

2 In support of the foregoing Stipulation, the parties through their undersigned counsel ,  
3 declare as follows:

4 1. On October 9, 2007, this Court granted a modification to the Pre-Trial Preparation  
5 Order, establishing June 13, 2008 as the discovery cutoff date for both expert and non-expert  
6 discovery requests.

7 2. On March 20, 2008, Plaintiff filed a Motion to Compel Production of Personnel  
8 Files in this case. The Court responded to Plaintiff's Motion on April 22, 2008, partially  
9 granting Plaintiff's request for personnel files. Defendants, as a result, have had thirty (30) days  
10 to submit these personnel files. Plaintiff expects to receive these personnel files very shortly.

11 3. Plaintiff anticipates propounding additional discovery requests upon  
12 review of these personnel files. Pursuant to Federal Rules of Civil Procedure, Rule 33(b)(2) and  
13 Rule 34(b)(2)(A), parties have thirty (30) days to respond to discovery requests propounded to  
14 them. The current date set for discovery cutoff on June 13, 2008 will not provide Defendants  
15 with the requisite thirty days (30) to respond to these anticipated discovery requests. Therefore,  
16 Plaintiff will require additional time in discovery to submit these discovery requests and obtain  
17 responses from Defendant to these discovery requests.

18 4. Further, the parties are currently in the process of "meeting and conferring" on  
19 other discovery issues and scheduling depositions during this month. Also, Plaintiff's Counsels  
20 will be at trial during much of the month of June on a complex litigation matter in another case  
21 and will be preparing for the trial during the month of May. The additional 30 days of discovery  
22 will help ease the burden of scheduling depositions and resolving discovery issues in this case  
23 during this period.

24 5. The parties still anticipate appearing for the scheduled settlement conference on  
25 June 26, 2008 with Magistrate Judge Elizabeth LaPorte, as most of the discovery will have been  
26

1 completed by then. The parties request that the succeeding dates from the Pre-Trial Preparation  
2 Order be amended as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Dispositive Motions Filed	July 11, 2008	August 11, 2008 <sup>8/11</sup>
Opposition to Motions Due	July 25, 2008	August 25, 2008 <sup>8/15</sup>
Reply to Motions Due	August 1, 2008	September 1, 2008 <sup>8/22</sup>
Dispositive Motion Hearing Date	August 17, 2008	September 17, 2008 <sup>8/31</sup>
Pre-Trial Conference Date	September 23, 2008	September 30, 2008 <sup>9/14</sup>

7  
8 6. For the foregoing reasons, the parties hereto, by and through their undersigned  
9 counsel, declare, under penalty of perjury, that the foregoing statements are true and correct, and  
10 request the Court to extend the the discovery cutoff date by one month as set forth above.

11 Respectfully submitted,

12 LAW OFFICES OF NEVIN & ABSALOM

13 Dated: May 22, 2008

14 By: /S/

KENNETH C. ABSALOM  
Attorney for Plaintiffs

16 GORDON AND REES, LLP

17  
18 Dated: May 22, 2008

By: /S/

MICHAEL A. LAURENSEN  
Attorneys for Defendants

20 *has amended*  
21 PURSUANT TO STIPULATION, IT IS SO ORDERED,

22 Dated: May 23, 2008

23 UNITED STATES DISTRICT JUDGE